

1           What did we tell him then? We told him get an  
2       opinion from an FCC counsel three business days before you  
3       enter into any agreement, oral or written. Disclosure was  
4       important at that point because that would have had to have  
5       been disclosed before an opinion could be rendered.

6           The reason we were told we didn't get the opinion  
7       until March 31 is because they didn't have all the  
8       documents.

9           Q     Mr. Sackley, you and I are talking past each other  
10      in some ways.

11          A     It's a circular reference here that you can't ever  
12      get out of.

13          Q     Let me try.

14          A     Okay.

15          Q     You testified a moment ago that in September of  
16      1993, you perceived an FCC problem, correct? After your  
17      conversation with Mr. Dille, you perceived an FCC problem?  
18      Not a problem with Crystal. Not a problem with your board  
19      of directors. A problem with the FCC.

20          A     A potential for that, yes.

21          Q     And I think you have agreed with me, but tell me  
22      again if I have it wrong, that that problem did not have to  
23      do with the transaction that Mr. Dille had described or the  
24      structure that Mr. Dille had described. It had to do, in  
25      your words, simply with disclosure, correct?

1           A     That's correct.

2           Q     You have also told us that you never had any  
3 conversation with Mr. Hicks or with Mr. Dille about what  
4 would be disclosed on the FCC application prior to the  
5 filing of that application. Is that a fair statement?

6           A     That's correct. We had no discussions whatsoever  
7 about the preparation of the application and what would be  
8 included in it.

9           Q     You have also told us in September of 1993 the  
10 application had not even been filed. Have I got that right?

11          A     I believe that it was not filed until December.

12          Q     After your first meeting with Mr. Dille in  
13 September, I think you described in response to questions  
14 from Mr. Shook a Crystal board meeting that occurred  
15 approximately September 28, 1993. Is that correct?

16          A     Correct.

17          Q     One of the concerns you had, I think, at that time  
18 was that Mr. Hicks would spend too much of his personal time  
19 on WRBR?

20          A     We asked him about that, and he responded.

21          Q     He was working for you, and you were concerned  
22 that he was going to go off and spend a lot of time working  
23 at WRBR?

24          A     Any time at all, I guess, would have been a  
25 problem, you know, during working hours when he should be

1 attending to duties here, yes.

2 Q But I am just asking whether that was a concern?

3 A Yes, it was.

4 Q And you raised it with him?

5 A (Non-verbal response.)

6 Q When you raised it with him, what did he say was  
7 going to be done?

8 A What did he say was going to be done?

9 Q In connection with --

10 A What he would be doing?

11 Q Did he say they were going to hire a general  
12 manager at RBR?

13 A In September, I'm sure that that didn't come up,  
14 no.

15 Q You think it did not come up in September?

16 A (Non-verbal response.)

17 JUDGE CHACHKIN: State your answer.

18 THE WITNESS: Okay. The focus at that meeting was  
19 on whether this would have an impact on his duties at  
20 Crystal because if he was going to be a licensee he would  
21 have responsibilities for programming the radio station. We  
22 knew there was a rule about you had to have two full-time  
23 people. One had to be a manager there.

24 BY MR. JOHNSON:

25 Q Now, in September, at the time of the board

1 meeting on September 28, 1993, I take it that you, Mr.  
2 Sackley, understood at that time that all Mr. Hicks was  
3 doing was considering a proposal that had been made by Mr.  
4 Dille?

5 A At that point, sure. It was just a proposal, not  
6 a -- as far as we knew from what he said, there was nothing  
7 signed. It was a possibility and certainly not a done deal  
8 at all.

9 Q Okay. Just to be clear, I think you told us in  
10 the deposition that you understood in September of 1993 at  
11 that point that there was no agreement, no options, no  
12 application, no nothing. Is that a fair characterization of  
13 what you understood in September of 1993?

14 A We were not told that there was anything.

15 Q Well, your understanding was that there was not?

16 A Correct. Correct.

17 Q So I take it, at least based on everything you  
18 know, we do not have a dispute here today that there were  
19 any agreements, any options or ownership or otherwise, that  
20 you are aware of as of September 28, 1993?

21 A Again, in an FCC context or in an actual context?

22 Q You told us in your deposition that there was, "no  
23 agreement, no options, no applications, no nothing." Is  
24 that a fair statement?

25 A Correct.

1           Q     I think you told us this morning at the  
2     September 28 board meeting you questioned Ric Brown about  
3     the proposed or contemplated transaction at the September 28  
4     board meeting. Is that correct?

5           A     He was present and took part in the discussion,  
6     yes.

7           Q     And he was present as counsel to, I think you have  
8     already told us, Crystal at that board meeting?

9           A     What hat he believed he was wearing at the meeting  
10    was up to him. He was a director. Was he attending the  
11    meeting as a director?

12                    Again, I will go back to your legal profession. I  
13    don't know if you cannot be counsel if you're at a board  
14    meeting if you're -- I don't know if you can separate those  
15    things or not.

16           Q     But your understanding, at least, was that he was  
17    acting as Crystal's counsel?

18           A     Certainly.

19           Q     And you questioned him about Mr. Hicks' and Mr.  
20    Dille's proposed transaction involving Mr. Hicks and Mr.  
21    Dille's children? Is that correct?

22           A     Yes.

23           Q     You questioned him in front of the board?

24           A     This all took place with six people sitting around  
25    a table, yes.

1 Q And what Mr. Brown told you and the other board  
2 members is there is nothing wrong with this transaction?

3 A That's correct.

4 Q He was not unequivocal about it? He was certain  
5 about it? There is nothing wrong with this transaction.

6 A Well, you have to know Mr. Brown. This was a  
7 corporation that I guess they were going to have to set up  
8 some kind of a business entity. That, to the best of my  
9 knowledge, hadn't begun at that point.

10 This is FCC. He's not an FCC attorney, so he was  
11 relying upon advice given him people outside that room for  
12 making those statements, and he said that.

13 Q Mr. Brown was there as your lawyer? He was giving  
14 this advice to you, to Crystal?

15 A Again, I don't know in your profession how you  
16 subdivide those responsibilities. I can't give you a  
17 definitive answer whether he was our lawyer or board member  
18 or whether he was one or the other or both at the same time.  
19 I don't know that.

20 I expected that anything that he would give us  
21 would, you know, take all those factors into consideration.

22 Q Whatever hat he was wearing, he was telling you  
23 that this was all fine, correct?

24 A That was what he said, yes.

25 Q You do not have any reason to believe that he told

1 Mr. Hicks anything different than that, do you?

2 A I have no idea what he told Mr. Hicks.

3 Q Now, this morning you testified about the  
4 January 28, 1994, Crystal board meeting. Was that the next  
5 meeting of the Crystal board, or were there any intervening  
6 meetings?

7 A That was the next meeting.

8 Q At the time of that meeting, you, Mr. Sackley, had  
9 learned that Hicks Broadcasting had filed an application for  
10 the transfer of the license? Is that correct?

11 A Yes, sir.

12 Q I think you told us you learned about that from  
13 your accountant, who learned about that from a publication.  
14 Do I remember that right?

15 A That's correct.

16 Q At the time of the board meeting, refresh my  
17 memory. What materials had you actually reviewed in  
18 connection with that application?

19 A Dick Zaragoza had obtained whatever it was that  
20 was filed with the Commission, the application and the  
21 supporting materials. That's all. That's all we had.

22 Q Had you personally reviewed them?

23 A Yes, I did.

24 Q The application and the supporting materials?

25 A Correct.

1           Q     I do not think there is any meaningful dispute  
2     about this, but I wanted to see if you knew. The  
3     application discloses, does it not, that Mr. Dille's  
4     children were purchasing WRBR with Mr. Hicks?

5           A     Yes, it does.

6           Q     It also discloses their relationship with Mr.  
7     Dille. That is not in any way concealed in the application,  
8     is it?

9           A     No, sir.

10          Q     It discloses, does it not, Mr. Dille's  
11     attributable interest in the newspaper?

12          A     I guess it does.

13          Q     It is not concealed. I mean, it is right out  
14     there?

15          A     Right.

16          Q     It discloses Mr. Dille's children's  
17     non-attributable interest in the newspaper, correct?

18          A     Correct.

19          Q     Let me just ask you this, Mr. Sackley, based upon  
20     your impressions at the time. If Mr. Dille's children had a  
21     non-attributable interest in the newspaper, would there have  
22     been any reason under the FCC rules that they simply could  
23     no have purchased WRBR?

24          A     I have no idea.

25          Q     You do not have any idea about that one way or the



1 other?

2 A (Non-verbal response.)

3 JUDGE CHACHKIN: You will have to keep your voice  
4 up.

5 MR. JOHNSON: I am sorry, Your Honor.

6 BY MR. JOHNSON:

7 Q I said you do not have any idea about that one way  
8 or the other?

9 A I don't have any specific knowledge of the -- I  
10 know the attributable interest rules have changed  
11 considerably over the past five years. I don't know what  
12 they were at the time or what they are now.

13 I know that it was non-voting stock, and that must  
14 have had some -- there must have been some reason for it to  
15 be non-voting; probably because of the attribution. I don't  
16 know.

17 Q Well, you speculated in your deposition that if  
18 they had voted the stock in a blind trust or something like  
19 that they might have been able to acquire it even without  
20 Mr. Hicks. Do you remember that?

21 A I remember saying that, speculating that, yes.

22 Q But you are just saying that is kind of a gut  
23 feel, not really an analytical --

24 A Again, Mr. Guzman was asking me questions, and I  
25 was trying to be responsive because he was asking them. He

1 said if you've got an opinion, tell me your opinion. He let  
2 me go on, and I did.

3 Q You did have a problem with the application, did  
4 you not, at the --

5 A Yes, I did.

6 Q -- January 28, 1994, board meeting?

7 Your problem, I think you described to Mr. Shook,  
8 was that the application did not describe what you thought  
9 was an understanding between Mr. Hicks and Mr. Dille's  
10 children regrading future ownership. Is that correct?

11 A That's correct.

12 Q I think you said at your deposition that you  
13 questioned Mr. Brown about that at the meeting. Is that a  
14 fair statement?

15 A That's correct.

16 Q Mr. Brown stated to you that there was no  
17 agreement in writing or words to that effect. Is that not  
18 true?

19 A That's correct.

20 Q I take it he was conveying to you that based upon  
21 his understanding of the state of discussions, whether it  
22 was right or wrong, what he was conveying to you was that  
23 based upon his understanding of the state of discussions  
24 between Mr. Hicks and Mr. Dille's children that there was no  
25 requirement to disclose anything under the FCC application?

1           A     I don't know that he said those -- I don't think  
2     -- Ric is a pretty good attorney. I don't think he would be  
3     expressing an opinion as to what would be appropriate for an  
4     FCC application.

5           The discussion about disclosing the ownership  
6     dealt with the response to that question, the question being  
7     describe if there are any understandings, contracts,  
8     documents, options. You've got the form. You know what it  
9     says.

10          Q     You do not think he would have expressed a view  
11     about what was required under the application?

12          A     He may have interpreted it, talked about it, but  
13     he was not a definitive authority, which is why we went back  
14     again to where is the FCC counsel opinion, Ric, that we  
15     should have had before this was filed.

16          Q     Based upon his interpretation, in talking about  
17     it, though, what he told you was that given the facts as he  
18     knew them, there was no requirement to disclose anything?

19          A     Yes, and again that's because he had been assured  
20     by others that that was the case, not that he independently  
21     had determined that.

22          Q     The others being FCC counsel?

23          A     FCC counsel, Dave, John Dille, John Dille's  
24     lawyers in Elkhart. Just other people. That really wasn't  
25     the -- that wasn't the focus about who said this. The focus

1 was on the application itself the lack of an opinion.

2 Q I just want to be clear because it is an important  
3 conversation. You at least understood that Mr. Brown, based  
4 on whatever knowledge he had and whatever expertise he had,  
5 there as a member of the Crystal board and Crystal's lawyer,  
6 was telling you it was his understanding there was no  
7 disclosure requirement?

8 That was his explanation of why nothing was  
9 disclosed because, given the facts as he knew them, there  
10 was no requirement to disclose anything?

11 A You're going back to disclosure again. It's --

12 Q Well, that is what you asked him about, was it  
13 not?

14 A We're talking about the whole process and asked  
15 where is -- if you check this box No, how can you truthfully  
16 check this box No if there is an understanding, agreement,  
17 that you will transfer your stock, Dave's stock, to the kids  
18 or to Mr. Dille at a future date?

19 We said how can that be the case? That was well,  
20 it's not in writing. We said well, this doesn't ask for  
21 only things in writing. It asks for understandings. We got  
22 that same excuse for --

23 Q Did he call it an excuse?

24 A No.

25 Q That is your word?

1           A     That same reason. Why we didn't have the opinion  
2     is because these things weren't in writing, so understand  
3     that.

4                     It wasn't -- no one was disputing at that meeting,  
5     including Mr. Hicks and Mr. Dille. No one was disputing  
6     that there was an intention and a plan to transfer this  
7     station to John's kids or him in the future. No one was  
8     disputing that.

9           Q     You said, Mr. Sackley, and I know you did not mean  
10    this. You said neither Mr. Hicks nor Mr. Dille was  
11    disputing that.

12          A     Excuse me. Neither Mr. Hicks nor Mr. Brown.

13          Q     Obviously Mr. Dille was not at the meeting.

14          A     Mr. Dille was not there. I'm sure he would have  
15    liked to have been there.

16                     Neither were disputing that there was a plan to  
17    transfer the station to the kids in the future. They were  
18    saying that the reason that that was not relevant for the  
19    FCC application was because nothing was in writing, and then  
20    we were going back and forth about whether this says it must  
21    be in writing or whether an understanding is enough.

22          Q     I understand the distinction.

23          A     That's why he insisted he could not have provided  
24    an opinion because if it wasn't written down, he couldn't  
25    give an opinion.

1           Q     I understand the distinction you are making, and  
2     we will have the benefit of hearing from Mr. Brown about  
3     this later in time.

4                     I just want to make sure what you understood he  
5     was telling you and the board. Was he telling you and the  
6     board that based on everything he knew, as he understood it,  
7     right or wrong that is for Judge Chachkin to decide, but  
8     based on everything he knew there was nothing to disclose?  
9     There was no disclosure requirement? He was telling you  
10    that that application is accurate?

11           A     I don't know that Ric Brown ever said the  
12    application is accurate. He was explaining why in his  
13    interpretation there was not a problem with having checked  
14    that No box.

15           Q     And that is what you understood him to be saying  
16    to you? Based on everything I know --

17           A     Absolutely. He was telling us everything is fine.  
18    Don't worry about it. This has been checked by other  
19    people. Don't worry about it.

20           Q     Do you have any reason to believe that he advised  
21    Mr. Hicks any differently?

22           A     Again, I will say I have absolutely no idea what  
23    Ric said to Dave at any time about that.

24           Q     Now, you also discussed in connection with the  
25    January 28, 1994, board meeting a statement by Mr. Hicks, I

1 believe, to the effect that if there is financial trouble,  
2 John Dille will be at my door. Do you remember that?

3 A Yes, sir.

4 Q You remember him actually using those words?

5 A Yes, sir.

6 Q To the best of your recollection, that is how he  
7 described how he responded to the question about his future  
8 financial exposure? John Dille will be at my door. Do I  
9 have that correct?

10 A Yes, sir.

11 Q He did not elaborate on precisely what that meant?  
12 He just said he will be at my door?

13 A Dave wasn't saying a whole lot, but that's what he  
14 said.

15 Q That is what he said. You and other members of  
16 the board of directors of Crystal at that time did not think  
17 that was much assurance, did you?

18 A I don't understand the question.

19 Q For example, you testified earlier that your  
20 father called him stupid for relying on that. Do you  
21 remember that?

22 A Correct. Okay. There wasn't much assurance that  
23 Dave would come out of this alive or that he would be  
24 financially backed.

25 Q Or that he had any commitment that he would be

1 financially --

2 A Now, I understand what you are getting at. Okay.

3 Q In fact, the board was quite hard on Mr. Hicks in  
4 that context. They were saying you do not have anything  
5 that you can rely upon here. Is that not correct?

6 A That's correct.

7 MR. JOHNSON: Your Honor, give me one second, if  
8 you may.

9 (Pause.)

10 BY MR. JOHNSON:

11 Q Mr. Sackley, I apologize for delaying. You  
12 described, I think, a conversation that you had with Mr.  
13 Campbell some time after the January board meeting. Am I  
14 correct?

15 A Yes.

16 Q In fact, it was sometime, in your best  
17 recollection, in April of 1994? Is that your understanding?

18 A I believe I testified that it was the day that I  
19 received the opinion letter. It's dated March 31, so it may  
20 very well have been on that day.

21 Q We will have an opportunity to hear from Mr.  
22 Campbell later in this proceeding, but the gist of your  
23 question to him was if there had been an agreement or  
24 understanding implicitly as of December 22, I take it, would  
25 that change your opinion? Is the question fairly put?



1 MS. SCHMELTZER: Objection. I do not understand  
2 the question.

3 THE WITNESS: Yes. I was going to say, I don't  
4 understand what December 22 --

5 MR. JOHNSON: That was the date of the filing of  
6 the application.

7 THE WITNESS: Okay. Well, this opinion is  
8 March 31, so much time had passed, and many documents had  
9 been assembled in that period of time.

10 MR. JOHNSON: Right. Okay.

11 BY MR. JOHNSON:

12 Q Your words are more important than mine. What did  
13 you ask him?

14 A After reading his opinion letter, I asked him  
15 about the option agreement or whatever you want to call it,  
16 the plan to transfer the station in the future, and he said  
17 that he didn't have anything that indicated that that was  
18 going to take place. He didn't have any documents.

19 Q I understand that. Then did you not ask him  
20 something else?

21 A I asked him if that was an understanding if that  
22 would have made a difference in the opinion, and he said it  
23 may very well have. I asked him. I said here's what we  
24 have been told about future ownership, and he said that he  
25 would look into that and get back to me.

1 Q And you never heard from him. So your question  
2 was if there was an agreement or understanding, would that  
3 have made a difference in your opinion, right?

4 A Correct.

5 Q And he said maybe?

6 A It may very well have.

7 Q Similarly, if there was not an agreement or  
8 understanding, presumably it would have made no difference  
9 in his opinion?

10 A One of the issues that I had with Mr. Campbell and  
11 his opinion was Mr. Campbell, in my mind, is not the one  
12 that should have provided an opinion.

13 Q I am having --

14 A No. I know what you're saying.

15 Q -- trouble tracking that to my question.

16 A I want to be very clear. His letter starts out  
17 and says -- it's addressed to Crystal Radio Group. It says  
18 you have requested an opinion. We didn't request an opinion  
19 from him. He had no contact with me about that opinion  
20 before it was rendered. He did not get any background or  
21 base information before rendering it.

22 At that point in time I was, frankly, quite  
23 surprised that they would go through the effort of even  
24 having someone render an opinion letter, considering that  
25 the application was already filed. By that point, the

1 Commission had approved it, so it seemed to be, you know,  
2 too little too late.

3 I knew that Mr. Campbell was being paid by Mr.  
4 Dille, and the issues that I had with respect to future  
5 ownership and Mr. Hicks' and Mr. Brown's statements about  
6 future ownership were ones that had to do directly with Mr.  
7 Dille and his children.

8 In talking with Mr. Campbell about this opinion  
9 letter, I didn't think I was going to get very far with it,  
10 and I knew I would never hear back from him, but Alan is a  
11 very honorable man.

12 People that I talk to in the FCC legal community  
13 say the guy is honorable, and without violating privilege  
14 I'll let you know that a couple of FCC attorneys say that  
15 Alan Campbell would not have issued an opinion that he  
16 didn't believe in and that he would not have shaded the  
17 truth or lied on anybody's behalf, so I really believe at  
18 that point in time that he had not been provided with any of  
19 this information that had been given to us routinely by Mr.  
20 Brown and Mr. Hicks.

21 Q As you sit here today, you do not have any reason  
22 to offer or disagree with that view of Mr. Campbell that you  
23 have just given us?

24 A Of Mr. Campbell? No.

25 Q So if Mr. Campbell comes and testifies, you would

1 at least presume he is going to tell us the truth about all  
2 these documents?

3 A I have no reason to believe otherwise.

4 Q Now let me come back to my question. You asked  
5 him whether if there had been an agreement or an  
6 understanding his opinion might have been different?

7 A Correct.

8 Q And he said maybe?

9 A Correct.

10 Q I will get back to that. Implicitly, I am asking  
11 you if you also had the understanding that if there was no  
12 agreement or understanding that his opinion would not have  
13 been different. Was that implicit in the conversation?

14 A I don't know. I don't know because again, this  
15 was --

16 Q It did not make an impression on you one way or  
17 the other?

18 A No. No.

19 Q I would like to just double check my own sense of  
20 the source of your knowledge on these topics.

21 Coming back, Mr. Sackley, to something that I  
22 suggested to you as we began this, I would like to separate  
23 out in as clear a way as you possibly can what you have  
24 learned through litigation and through other sources after  
25 January of 1994 from what you knew in January of 1994.

1           Am I correct at that time that the people you had  
2 spoken with who had direct knowledge of the transaction in  
3 question were Mr. Dille, Mr. Brown and Mr. Hicks?

4           A     This is prior to January 28, 1994?

5           Q     As of January 28. That is correct.

6           A     Additionally, John Cook, who was one of Ric  
7 Brown's partners.

8           Q     Okay.

9           A     That's it.

10          Q     So in discussing the transaction which brings us  
11 here today with those individuals with direct knowledge, is  
12 it fair to say that they all discussed the transaction with  
13 you openly?

14          A     No.

15          Q     Who was it that refused to discuss it?

16          A     Well, you asked if they discussed it openly, not  
17 if someone refused to discuss it.

18          Q     I am not asking you for an opinion based on later  
19 in time whether they told you the truth or not. I am asking  
20 you based upon your conversations at that time, did they  
21 seem to you to be discussing the transaction openly?

22          A     I don't believe that Dave Hicks discussed it  
23 openly, no.

24          Q     Well, the things that you have testified here  
25 today that give you concern, they come from Mr. Hicks or his

1 representative, do they not?

2 A That's correct. That's correct.

3 Q So at least he told you something, or we would not  
4 be here?

5 A Right. That's correct.

6 Q So Mr. Hicks did at least discuss the transaction  
7 with you and told you things that gave you concern, correct?

8 A Correct.

9 Q Mr. Dille discussed it with you openly? Is that  
10 correct?

11 A The only contact with Mr. Dille was that very  
12 short thing. I wouldn't call that a discussion as much as  
13 he said the things, and I listened. I really didn't have  
14 any --

15 Q Okay. Fair enough.

16 A -- feedback to him. I wasn't advising him on the  
17 transaction or the propriety of it.

18 Q Fair enough. Mr. Brown discussed it with you  
19 openly?

20 A He discussed it with me. I would say like Mr.  
21 Hicks, I believe there was more. To me, there's a lot  
22 lacking in the discussion. It was like pulling teeth  
23 getting stuff out of him.

24 Q He did not decline to discuss it with you? He did  
25 not say there is something here I am not going to tell you?

1 He did not say anything like that? He gave you his view of  
2 the transaction?

3 A Yes.

4 Q It is also fair to say, is it not, that everyone  
5 you discussed it with expressed their view to you that there  
6 was absolutely nothing wrong with the transaction and that  
7 there was absolutely nothing wrong with the application as  
8 it had been filed? Is that not a fair statement?

9 A Yes.

10 Q Now, later in time, you testified this morning,  
11 that you had a conversation with Mr. Dille in or about  
12 September of 1996 in New Orleans. Do you recall that?

13 A That's correct.

14 Q At that point in time, you knew a lot more than  
15 you knew in September of 1994, and you also knew a lot more  
16 than you knew in -- September of 1993. I apologize. You  
17 also knew more than you knew in January of 1994, correct?

18 A Time had passed. There had been more information  
19 out there.

20 Q Well, you were in litigation with Mr. Hicks at  
21 that point?

22 A Right. Correct.

23 Q That was the purpose of your meeting with Mr.  
24 Dille was to get his assistance in resolving that litigation  
25 with Mr. Hicks?

1           A     That's correct.

2           Q     I think you told us this morning that one of the  
3 things that you conveyed to him was that like it or not, he  
4 was going to be a participant in that litigation, correct?

5           A     In as many words, yes.

6           Q     You also told him, did you not, that FCC issues  
7 were very much going to be a subject of that litigation,  
8 correct?

9           A     That's correct.

10          Q     And what you intended to convey to him was that  
11 both he and Mr. Hicks had a stake in this litigation beyond  
12 whatever Mr. Hicks' dispute was with you, correct?

13          A     To the extent that things that came out of this  
14 litigation may impact upon their licenses, yes.

15          Q     That is what you were trying to convey to him is  
16 that things were going to come out in this litigation that  
17 may impact your license?

18          A     That's correct. That's true.

19          Q     Is it not also true that what Mr. Dille said in  
20 response to you is I have not done anything wrong?

21          A     Correct.

22               MR. JOHNSON: Thank you, Mr. Sackley. I do not  
23 have anything further.

24               JUDGE CHACHKIN: All right. We will take a ten  
25 minute recess.